
From: Martin B. O'Connor II <[REDACTED]>
Sent: Wednesday, December 10, 2014 8:07 PM
To: jeffrey E.
Cc: Peggy Siegal; georgej@gtlaw.com
Subject: Re: Attorney-Client Privileged Communication

By finance you mean pay 175 at a later period 45/60 days. Yes?

Martin B. O'Connor, II, Esq.
O'Connor, Morss & O'Connor, P.C.
Post Office Box 979
Elizabeth, New Jersey 07207-0979
[REDACTED]

On Dec 10, 2014, at 12:01 PM, "jeffrey E." <jeevacation@gmail.com <mailto:=eevacation@gmail.com> > wrote:

get the first 426 and have gary agree now to finance=175 or pay 150 now. not sure why this can't be done in a phone call.=br>

On Wed, Dec 10, 2014 at 12:35 PM, Peggy Siegal <[REDACTED]> <mailto:[REDACTED]> > wrote:

What's going on. I don't understand. It feels like Gary does not have th= money to pay me...which is exactly what I was saying for three years. He is a thief.

From: Martin B. O'Connor II [mailto:[REDACTED]>]
Sent: Wednesday, December 10, 2014 10:10 AM
To: georgej@g=law.com <mailto:georgej@gtlaw.com> <georgej@gtlaw.com>
<mailto:[REDACTED]> >; Peggy Siegal
Subject: RE: Attorney-Client Privileged Communication

Jim and Peggy,

I am back in the office this afternoon and will call you, Jim and therea=ter reach out to Jamie.

M

Martin B. O'Connor, II, Esq.
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Sent: Tuesday, December 09, 2014 10:04 AM
To: Martin B. O'Connor II; [REDACTED]
Subject: Attorney-Client Privileged Communication

Martin and Peggy

As I mentioned to Martin when we spoke this morning, Ms. Dyce advised me yesterday evening that Gary has been working diligently to obtain financing to pay the \$150,000 part of the payment due Peggy under the proposed agreement. As you can see from the e-mail below, Gary hopes to have an answer regarding financing today. She has not wanted Gary to sign the agreement when Gary is still working on the financing because Gary would be exposed to liability for attorney fees if he defaults on the \$150 payment. (At least that explains why she was unresponsive).

She also explained that the reserve fund of \$40,000 has, or is exhausted, by professional fees for the estate and trust (predominantly her firm's services for an extended period of time).

Therefore, she advises me that Gary is prepared to make immediate payment of the \$426 but needs more time than 15 days for the \$150. (What she would really like is for Gary to pay Peggy over time). As Martin mentioned getting the money out of Gary's hands makes sense. Perhaps the most cost efficient route, subject to Peggy's approval, is to revise the agreement to provide that Gary will make immediate payment of the \$426 by wire and give him 45 or 60 days to obtain financing for the \$150 and tell Ms. Dyce that this has to be wrapped up this week otherwise Peggy will seek her remedies in court.

I will let you know if I hear from Ms. Dyce regarding the financing today. I doubt it.

Jim

James R. George
Shareholder
Greenberg Traurig, P.A. | 401 East Las Olas Boulevard Suite 2000 | Fort Lauderdale, FL 33301

georgej@gtlaw.com <mailto:georgej@gtlaw.com> | www.gtlaw.com <http://www.gtlaw.com/>

<image001.jpg>

From: Dyce, Jamie =. [mailto:]>
Sent: Monday, December 08, 2014 5:33 PM
To: George, James R. (Shld-FTL-LT)
Cc: < >
Subject: RE: Call Today

Thanks for speaking with me today. I spoke with Gary, he has a meeting with Capital One tomorrow and a call expected from Bank of America. I will let you know as soon as I have an update.

Jamie R. Dyce
Associate

Duane Morris LLP
1540 Broadway
New York, NY 10036-4086



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<<mailto:georgej@duaw.com>>

Sent: Monday, December 08, 2014 3:53 PM
To: Dyce, Jamie R.
Subject: RE: Call Today

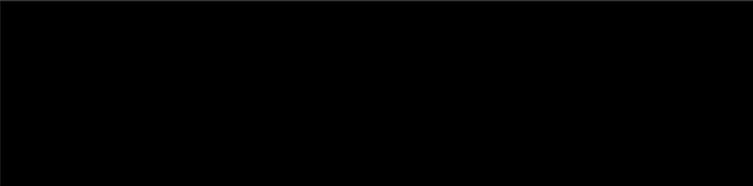
YEs

From: Dyce, Jamie R. [mailto:
Sent: Monday, December 08, 2014 3:53 PM
To: George, James R. (Shld-FTL-LT)
Cc:  <mboc@ocomo.com> <<mailto:mboc@ocomo.com>>
Subject: RE: Call Today

I need a few, can we do 4:30? Thanks.

Jamie R. Dyce
Associate

Duane Morris LLP
1540 Broadway
New York, NY 10036-4086



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Sent: Monday, December 08, 2014 2:24 PM
To: Dyce, Jamie R.
Cc: ~~mboe@scamora.com~~; ~~mboe@scamora.com~~>
Subject: FW: Call Today

Jamie

Martin asked that I speak w=th you this afternoon as you suggested. Does 4:00 p.m. work with your sche=ule?

Jim

From: George, Jame= R. (Shld-FTL-LT)
Sent: Monday, December 08, 2014 8:23 AM
To: 'Dyce, Jamie R.'; Martin B. O'Connor II
Cc: Pat Zwarycz
Subject: RE: Call Today

Jamie

What time should I call you=

Jim

From: Dyce, Jamie =. [mailto:JDyce@duanemorris.com] <mailto:JDyce@duanemorris.com>]
Sent: Friday, December 05, 2014 3:45 PM
To: Martin B. O'Connor II
Cc: George, James R. (Shld-FTL-LT); Pat Zwarycz
Subject: RE: Call Today

I'm sorry, I cannot do to=ay. Monday afternoon?

Jamie R. Dyce<pan style="FONT-SIZE:7.5pt;FONT-FAMILY:"Arial", "sans-seri=";COLOR:#1f497d">
Associate

Duane Morris LLP
1540 Broadway
New York, NY 10036-4086
P: 212 471 1888, tel: 212 471 1888

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From: Martin B. O'=onnor II [mailto:Martin.B.O'Connor@duanemorris.com] <mailto:Martin.B.O'Connor@duanemorris.com>]
Sent: Friday, December 05, 2014 2:47 PM
To: Dyce, Jamie R.
Cc: Jim George; Pat Zwarycz
Subject: Call Today

Jamie,

Could we have a call today at 5:30 p.m.? I have included our=dial in details - <tel:1-888-363-4734> – Access Code 4236591. Please reply all.</=pan>

Best,

Martin B. O'Connor, II, Esq.
O'Connor, Morss & O'Connor, P.C.

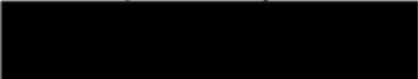
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